

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Civil Action No. 04-30014-MAP

THE MERCY HOSPITAL, INC.,)
Plaintiff)
v.)
MASSACHUSETTS NURSES)
ASSOCIATION,)
Defendant)

JOINT STATEMENT

A. AUTOMATIC DISCLOSURES:

Automatic disclosures are to be made on or before May 10, 2004.

B. DISCOVERY PLAN:

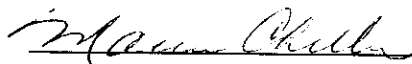
The parties propose that any discovery, without phasing, shall be completed by June 1, 2004.

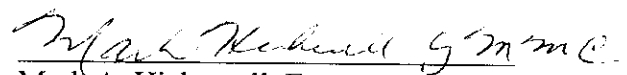
C. MOTIONS:

All motions for summary judgment, or other dispositive motions, shall be made by July 1, 2004. Response to any such motion shall be made by August 1, 2004.

THE PLAINTIFF
BY ITS ATTORNEY

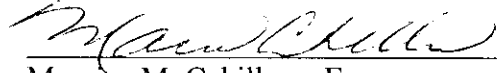
THE DEFENDANT
BY ITS ATTORNEY


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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served this 21st day of April, 2004, on all parties, by First Class Mail, postage prepaid, to Mark A. Hickernell, Esq., McDonald & Associates, 153 Cardaville Road, Suite 210, Southborough, MA 01772.



Maurice M. Cahillane, Esq.

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